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Comment to the National Organic Standards Board
State College, PA

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Welcome to the new NOSB members and thank you to the Board and to NOP for the opportunity to comment today. As many of my comments have been made or will be made in other statements, written and spoken, my intention is to emphasize a few highpoints to jog your memory when they arise elsewhere.

First, in your consideration of the clarification of the definition of synthetic, please keep in mind the need for clear intent and objective of any recommendation put forward by the board, and what it is this clarification will serve as it relates to consumer expectation of how organic processed food, in particular, is made. A point was driven home during the dairy symposium that responding to consumer expectation that organic dairy animals should be paramount to science based dairying. Interesting that another comment on the issue of the definition of synthetic stresses the need for science. How does that relate then to consumer expectation about what should be allowed in organic foods.

Please keep in mind also the need to avoid any further ambiguity in the use of the term synthetic that might come up in any new definition of the terms substance and chemical change and finally on this point, please note what appears to be the synonymous relationship between formulating, manufacturing and processing.

Then regarding the recommendation of the Joint Handling and Policy Development Committee for Commercial Availability, I point out that according to the language of the court order, all non-organic agricultural substances must be placed on the National List Section 205.606 and then determined by the certification body if, based on the organic handling plan submitted by a certified entity that the substance in fact commercially unavailable in organic form. I encourage you to provide clear and complete guidance to the ACAs to uniformly facilitate that determination.

Furthermore, and this is a new suggestion not reiterated anywhere else, please consider approving petitions for similar substances, such as all dried leaves of green herbs, if all are produced identically, one petition may cover approval of dried oregano, dried sweet basil, dried marjoram, etc. This may close potential loopholes of categorical petitions, yet expedite approvals of very similar agricultural substances.

Finally, in your consideration of acceptance of the Aquaculture Working Group Interim Final Report, please give serious consideration of the need for any standard for aquaculture production to comply with OFPA, especially the requirement for all organic livestock, including fish, be fed organic feed. The suggestion supported by the Organic Seafood Council to allow a five year sunset period during which time organic aquaculture products may be fed some percentage of non-organic feed will follow precedent implemented before in other instances, such as the temporary allowance of methionine for poultry. This will also give the aquaculture industry time to develop feedstocks that will comply with OFPA while providing a superior product in the marketplace and filling the ever growing demand for organic products of all kinds.

Thank you very much for your consideration of my comments and looking forward to an exciting and productive meeting with you.